

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF)	
v.)	Case No. 07 CR 821-3
)	
)	Judge Charles Norgle
DAVID VIZCARRA,)	
)	
DEFENDANT)	

DEFENDANT DAVID VIZCARRA'S EMERGENCY MOTION FOR BOND

Now comes Defendant David Vizcarra, by and through his attorney and pursuant to 18 U.S.C. Sec. 3142 moves this Court to set a bond so that he can be released for one month prior to trial to spend time under home incarceration with his very ill mother. In support of this motion, Defendant states the following.

1. Defendant David Vizcarra has been indicted for conspiracy to kidnap and kidnaping a person for ransom. Mr. Vizcarra's father is also named in the indictment. His father has been released on bond and is living at home with his wife, David Vizcarra's mother.

2. Except for a brief stay in Utah, Mr. Vizcarra, who was born in the United States, has lived in Chicago.

3. Mr. Vizcarra has a prior work history and had a part-time job before being arrested in this case. He has had a few arrests for resisting and battery, operating a vehicle while intoxicated and a DUI.

4. Mr. Vizcarra's mother is apparently about to die. She is currently

hospitalized with very severe seizures. Defendant's attorney has received telephone calls from his sister, Elsa Rocha, asking if Defendant can be released for 2-3 days. r. Vizcarra wants to be released so that he can be with his mother when she dies. .

5. His family, including his sister Elsa Rocha, who lives nearby, and his mother are in agreement with this request. His uncle, who has posted his home as security so that Mr. Vizcarra's father could be released on bond, is willing to serve as third party custodian.

6. When Mr. VIZCARRA was arrested, he cooperated with the Government.

WHEREFORE DEFENDANT David Vizcarra prays that this Court grant his emergency motion for two to three day release from custody as outlined above.

Respectfully submitted,

s/Steven Saltzman

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